RAP, RCA, CWA, SPA inc. 26.6.93

General remarks

1. procedural claims well supported by citations

2. scientific claims (epidemiology, statistics, biol. plausibility)
   no ref. to EPA doc.
   " published lit.

3. plenty vague statements, not wrong, but not relevant

4. high degree of redundancy

Strong arguments:

1. change of stat. procedures (retrospective)
2. background correction based on N.E. VA/ov
3. misclassification bias (4%?)
4. formal authority of EPA
5. 2nd correction term

consultancy expertises

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Source: https://www.industrydocuments.ucsf.edu/docs/mpgb0003